

PUBLIC SUBMISSION

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Linear No-Threshold Model and Standards for Protection Against Radiation

Comment On: NRC-2015-0057-0010

Linear No-Threshold Model and Standards for Protection Against Radiation; Notice of Docketing and Request for Comment

Document: NRC-2015-0057-DRAFT-0061

Comment on FR Doc # 2015-15441

Submitter Information

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General Comment

To Whom It May Concern,

If you are going to take into consideration 30-year old research on hormesis, then it's only fair that you take into consideration Dr. John Gofman's thorough research on the dangers of low-level radiation -->

Quoting Dr. John Gofman:

Whats the order of magnitude of the problem thats been created by radiation in the 20th century? Today manmade activities added up in total exceed the dose from natural radiation.

Every increment that we add to that natural radiation will exact its price in human health, and human health with respect to some very miserable diseases such as the genetic disorders and heart disease and cancer.

50% of all cancers in the 20th century have been caused by ionizing radiation of the type we would call low-level.

Recently I wrote a book on the subject of breast cancer and stated that my best estimate backed up by considerable

evidence is that about 50 % of all the breast cancers of the 20th century were induced by ionizing radiation of one sort or another, including medical. This is not a small problem and we there therefore need to give attention to every source of low-level radiation exposure to the public.

"In the early days of the post-war period when radioactivity became available in large quantities as the result of the existence of nuclear reactors, many of the people working in the field said, Well, what dose can we allow people to have which will be safe?

"I wrestled with that question for over 20 years, and in 1986 on a talk about Chernobyl, I presented to the American Chemical Society, my initial calculations which said:

THERE CANNOT BE A SAFE DOSE, BECAUSE AT THE LOWEST POSSIBLE DOSE, WHICH IS ONE RADIATION TRACK THROUGH THE CELL, I HAVE PROVED THAT CANCER IS THE RESULT."

> Quoting Dr. Gofman regarding Tritium:

Many people thinking about Tritium say oh we dont have to worry about tritium; the energy of the radiation is so low that we dont even need to think about it. But that is a cardinal error! It is true that the energy of each beta particle emitted by tritium is very low, BUT theres another problem. When you have a very low energy beta particle interact with biological tissue to produce the damage to genes, the damage to chromosomes, and the risk of future cancers, the lower the energy of the radiation, the WORSE it is in terms of biological hazards. Tritium is FIVE TIMES as hazardous as bomb radiation for the same total amount of energy delivered. And thats a general law, a rule of physics. I dont think any person who is reasonable at all can doubt that I have demonstrated THERE IS NO SAFE DOSE because I have shown with a multitude of studies that we get cancers down at the lowest doses. Now thats been resisted but the United Nations scientific community in 1993 has come out and joined me in exactly the same kind of analysis. Their conclusion:

THERE IS NO SAFE DOSE.

Source: <http://www.youtube.com/watch?v=wf4G0NRBfqY>

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You can also NOT discount this research on the dangers of low-level radiation:

[1] Low level radiation "ingested gradually" was "a factor in the increases in local cancer death rates" around

Oak Ridge,
Tennessee:

"Results indicate that the increases in the local area (under 100 miles from Oak Ridge) exceeded regional increases and far exceeded national increases. Within the region, increases were greatest in rural areas, in Anderson County (where Oak Ridge is located), in mountainous counties, and in the region downwind of Oak Ridge. Each of these findings suggest that low levels of radiation, ingested gradually by local residents, were a factor in the increases in local cancer death rates"

<http://www.ncbi.nlm.nih.gov/pubmed/7928016>

[2] "A statement signed by 45 medical doctors calls on uranium mining company Toro Energy to stop promoting the view that low-level radiation is beneficial to human health."

<http://www.mapw.org.au/news/doctors-slam-uranium-miner-over-junk-science-radiation-safety>

[3] The BEIR VII report which found:

(a) "High radiation doses tend to kill cells, while low doses tend to damage the genetic code (DNA)"

(b) Found a 3% increase in cancer at low doses

<http://www.totalwebcasting.com/view/?id=hcf>

[4] Hagelstrm et al (1995) Chromosomal damage in workers occupationally exposed to chronic low level ionizing radiation.
Toxicology letters 76(2): 113-117.

[5] "In one of the largest and longest follow-up studies ever conducted to assess the effects of ionizing radiation upon the development of soft tissue sarcomas in humans, the investigators found that much lower levels than previously ever identified lead to the development of soft tissue sarcomas and poor survival rates."

<http://medicalxpress.com/news/2013-02-atomic-bomb-survivors-ionizing-exposure-soft.html>